

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: CHRISTINA R. THOMAS,	:	Chapter 13
Debtor	:	
	:	
THE MONEY SOURCE INC.	:	
	:	Case No. 20-00821
Movant	:	
	:	
Vs.	:	
	:	
CHRISTINA R. THOMAS,	:	
DAVID E. THOMAS, AND	:	
CHARLES J. DEHART, III	:	
	:	
Respondents	:	

**ANSWER OF DEBTOR TO THE MONEY SOURCE INC.'S MOTION FOR
RELIEF FROM STAY & CO-DEBTOR STAY**

AND NOW comes your Debtor, Christina R. Thomas, by and through her counsel, Aaron J. Neuharth, Esquire and Answers Movant's Motion For Relief From Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part. Denied in part. It is admitted that the Debtor has failed to make timely payments to Movant, but the Debtor has submitted additional payments for which she has not received credit. Debtor is obtaining proof of those payments and they will be supplied as soon as we receive them.
7. Denied. See number 6 above.
8. Admitted.
9. Admitted.

Wherefore, Respondent respectfully requests this Honorable Court deny Movant's Motion and allow for the Debtor and Movant to enter into a stipulation to resolve the motion.

Date: December 22, 2020

/s/ Aaron J. Neuharth
Aaron J. Neuharth
Attorney for Debtor
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